

JORDAN K. CAMERON (12051)
jcameron@hjslaw.com
DURHAM JONES & PINEGAR, P.C.
3301 N. Thanksgiving Way, Suite 400
Lehi, UT 84043
Telephone: (801) 375-6600
Fax: (801)375-3865

Attorneys for Plaintiff ZooBuh, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

ZOOBUH, INC., a Utah Corporation
Plaintiff,
vs.
JDI DATING, LTD; WILLIAM MARK
THOMAS,
Defendants.

**APPLICATION FOR WRIT OF
EXECUTION**

Case No.: 2:17cv00163 DB
Judge Dee Benson

COMES NOW Plaintiff ZooBuh, Inc. (“ZooBuh”) and hereby applies for a Writ of Execution against the judgment debtor, JDI DATING, LTD’s (“JDI”) personal property pursuant to Fed. R. Civ. P. 69 and Utah R. Civ. P. 64E.

1. On August 29, 2017, this Court entered judgment against JDI in the amount of \$3,784,850. *See* Default Judgment [ECF 11].
2. The amount due on the judgment is \$3,784,850, plus post-judgment interest at the rate of 2.87% per annum. The total judgment amount remains due.
3. The judgment debtor is JDI Dating, Ltd.

4. The property to be seized consists of web domains owned by JDI Dating, Ltd., specifically:

cupidswand.com findmelo.com flirtcrowd.com

jdiddating.com justhookup.com

flirtcrowd.com

5. The aforementioned domains, though not technically physical property, are located with the domain registry, VeriSign, Inc. located at 12061 Bluemont Way, Reston, VA 20190.

6. The aforementioned web domains only have value to the judgment debtor and do not have value on a secondary market.

7. The value of the web domains, if any, is less than the judgment amount.

8. Plaintiff respectfully requests that a Writ of Execution be issued directing the U.S. Marshal to seize and sell the aforementioned web domains to satisfy part or all of the judgment.

9. Given that Defendant resides in the United Kingdom and defaulted on the Complaint filed in this action, Plaintiff respectfully requests that the Court permit service of the Writ of Execution along with the Notice of Execution, Exemptions, and Right to a Hearing and Request for Hearing form via mail to the address where Plaintiff was served. Plaintiff will return proof of service to this Court.

10. The following may claim an interest in the subject property:

**JDIDating, Ltd.
Flat 15
1 Gunwharf Quays
Portsmouth
PO1 3FR
United Kingdom**

DATED this 12th day of September, 2017.

DURHAM JONES & PINEGAR, P.C.

/s/ Jordan K. Cameron

Jordan K. Cameron

Attorneys for Plaintiff

CERTIFICATE OF MAILING

The undersigned hereby certifies that on the 12th day of September 2017, she caused a true and correct copy of the foregoing to be delivered to the following:

JDI Dating, Ltd.
Flat 15
1 Gunwharf Quays
Portsmouth
PO1 3FR
United Kingdom

Sent Via:

Hand -Delivery
 Facsimile
 Mailed (postage pre-paid)

/s/ Kim Altamirano

Kim Altamirano